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Export Certification Manual

Special Procedures

Sampling and Inspection Procedures for Seed

Contents

Introduction

References for general seed sampling and inspection procedures include the following:

- APHIS, PPQ Manuals on regulating imports which are available at the following web address: http://www.aphis.usda.gov/ppq/manuals/
- Specific export workplans, protocols, or guidelines listed in EXCERPT
- Export Certification Manual (ECM) – Steps to Certify; refer to **Figure 4-5-1 on page-4-5-3** for a list of the main inspection steps followed by detailed guidelines

Additionally, sampling and inspection guidelines for shipments of seed packets and hermetically sealed containers are also provided in the online Canadian Border Agricultural Clearance Manual, Procedures section, and may be used as appropriate.

The purpose of these procedures is to further clarify APHIS policy concerning Enzyme-Linked Immunosorbent Assay (Elisa) testing of treated corn (*Zea mays*) seed for *Pantoea stewartii* (=*Erwinina stewartii*) (Stewart's bacterial wilt).

Seed Sampling

It is APHIS policy that all seed samples to be used for phytosanitary certification purposes be officially drawn by Federal, State, or County plant regulatory officials or by a non-government accredited entity. This includes samples for weed seed examination, laboratory analysis for pathogens, insect examination, etc. A list of non-government accredited entities is provided as a Phytosanitary Note in EXCERPT. Additionally, non-government accredited entities are authorized to perform only those specific phytosanitary functions for which accreditation is held and listed.

Seed samples drawn by a seed company or other industry representatives (i.e. non-accredited entities) are not permitted.

Inspecting Treated Seed

Normally, it is difficult to inspect treated seed. If possible, seed shipments should be examined prior to treatment. If treated seed is to be inspected, take the necessary safety precautions (ECM, Methods and Procedures, General Inspectional Guidelines). Look for insect, weed seed, ergot, etc., contamination only.

Requirements for laboratory testing must be met prior to seed treatment except in the following cases:

- Laboratory testing for *Pantoea stewartii* (=*Erwinina stewartii*) (Stewart's bacterial wilt) using the Enzyme-Linked Immunosorbent Assay (Elisa) Technique
- Laboratory testing for *Claviceps africana* which MUST include a structural examination at 10x or greater magnification

Seed Cannot be certified based solely on the fact that it is treated and/or vacuum packed. Appropriate sampling and inspection must always be conducted.

Certifying Seed Treatments

To certify a seed treatment on a phytosanitary certificate, it may not be necessary to be physically present to witness the treatment. If a treatment is indicated on the label of the seed, it is monitored by the State personnel to insure EPA compliance. In such cases it is acceptable to attest to seed treatments based on the information contained on the seed label.

NOTICE

Seed treatments listed on foreign labels cannot be used to certify a seed treatment on a re-export phytosanitary certificate since we do not monitor seed treated in foreign countries.

Contact Export Services if you have any questions.

Pelletized Seed

Pelletized seed cannot be certified unless inspection is conducted prior to the seed being pelletized.

Important

The process of pelleting seeds is not a phytosanitary treatment but a process intended to create a consistent shape out of an irregularly shaped seed to assist in planting.

Time Limits

Laboratory analyses and tests, conducted post-harvest, do not have to be conducted within the time limits specified by a country or APHIS' general policy on time limits if the following condition is met:

The quarantine pest(s) (insects or diseases) cannot infect or infest the seeds post-harvest.

This is similar to field tests which do not have to meet time limits.

ACOs should confer with an entomologist, pathologist, nematologist, etc., as appropriate, to make this determination. If a Phytosanitary Certificate is issued based on a laboratory analysis or test that is conducted outside of specified time limits, documentation supporting the decision must be kept with the file copy of the PC.

TABLE 6-13-1 Time limit requirements when laboratory analysis or testing is required for seeds for propagation

If the pest or disease:	Then laboratory analysis or testing:
Infects or infests seeds post-harvest	Must meet time limits
Does **not** infect or infest seeds post-harvest	Does **not** need to meet time limits

Additionally:

1. The seed lot must remain intact; there can be no additions to the total weight of the lot and the seed remains unadulterated after the laboratory analysis or test has taken place. Should the seed be treated with a fungicide or pelletized after the laboratory analysis or test, the increase in weight must match the amount of product applied to the seed.
2. The lot number cannot change after the laboratory analysis or test has taken place.

The above policy does NOT change the policy with respect to inspection and time limits; inspections must be conducted within specified time limits.

Example	A country's time limits are that there can be no more that 21 calendar days between the inspection date and the shipping date AND the seeds cannot be infested post-harvest with the pests of concern: An exporter wants to export a consignment of seeds on June 30, 2005 based on a laboratory test that was conducted post-harvest on January 14, 2004. Because the following conditions were met the laboratory test does not need to be repeated to meet the country's time limits: 1. Seeds were harvested and were put into storage; 2. Quarantine pests of concern cannot infest the seeds post-harvest; 3. The seed lot has remained unadulterated since the laboratory test was conducted.